IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA,)	
v.) No. 1:18cr1	11
JULIAN PAUL ASSANGE)	
	MOTION TO DISMISS	

MOTION TO DISMISS

On March 6, 2018, the defendant was indicted by a grand jury in this district on one count. On May 23, 2019, the defendant was indicted in a superseding indictment by a grand jury in this district on 18 counts. On June 24, 2020, the defendant was indicted in a second superseding indictment by a grand jury in this district on 18 counts. On June 26, 2024, the defendant pleaded guilty to a criminal information in the U.S. District Court for the Northern Mariana Islands in Case No. 1:24-cr-0014. Pursuant to the plea agreement in that case, which is attached to this motion as Ex. 1, the Government moves to dismiss the Indictment filed on March 6, 2018, the Superseding Indictment filed on May 23, 2019, and the Second Superseding Indictment filed on June 24, 2020, and vacate the associated arrest warrants.

By:

Respectfully submitted,

RAJ PAREKH ACTING UNDER AUTHORITY CONFERRED BY 28 U.S.C. § 515 MATTHEW G. OLSEN ASSISTANT ATTORNEY GENERAL NATIONAL SECURITY DIVISION U.S. DEPARTMENT OF JUSTICE

By: /s
Gordon Kromberg
Assistant United States Attorney
Virginia Bar No. 33676
2100 Jamieson Avenue
Alexandria, VA 22314
(703) 299-3700
(703) 837-8242 (fax)
gordon.kromberg@usdoj.gov

Matthew J. McKenzie
Deputy Chief
Counterintelligence and Export Control
Section
Jacques Singer-Emery
Trial Attorney
National Security Cyber Section
National Security Division (NSD)
U.S. Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2024, I electronically filed the foregoing Motion to Dismiss and draft Order of Dismissal with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to counsel of record.

Gordon D. Kromberg
Assistant United States Attorney
Virginia Bar No. 33676
Attorney for the United States
2100 Jamieson Avenue
Alexandria, VA 22314
(703) 299-3700
(703) 837-8242 (fax)
gordon.kromberg@usdoj.gov